

PLAINTIFFS EXHIBIT C - EXCERPT OF PLAINTIFFS NOTICE OF DEPOSITION OF
DEFENDANT FACEBOOK, INC. PURSUANT TO FRCP 30(b)(6)

- b. Any person that develops an application, software experience, game, or website that accesses Content and Information from Facebook's API or other Facebook software; and
- c. Any person with whom Facebook has or had an integration partnership.

28. "You" or "your" or "Facebook" or "Defendant" means Defendant Facebook, Inc., together with your predecessors, successors, parents, subsidiaries, divisions or affiliates (foreign or domestic), and their respective current and former officers, directors, agents, attorneys, accountants, employees, partners, managers, members or other persons occupying similar positions or performing similar functions, and all persons acting or purporting to act on its behalf.

29. Words used in the plural include the singular, and words used in the singular include the plural.

30. Capitalized terms and acronyms not specifically defined herein have the same definition as in the FAC.

II. RELEVANT TIME PERIOD

Unless otherwise specified the relevant time period is January 1, 2007 through the present.

III. MATTERS FOR TESTIMONY

1. Your guidelines, policies, practices, procedures, or rules concerning the generation, use, management, location, collection, production, storage, backup, destruction, retention, and recovery of PRE, including email, voicemail, instant messaging and/or chat platforms, apps used for communicating about work responsibilities, direct message communications on social media network platforms, and text messages, to name a few.

2. All measures to preserve PRE You implemented in response to or in anticipation of this action or that you undertook in the Relevant Proceedings and that You are relying upon to preserve PRE in this action.

3. All measures to preserve PRE You considered in response to or in anticipation of this action but did not take and the reasons You did not take such measures.

4. All PRE that was deleted, overwritten, lost, or destroyed, including but not limited to the Lost Notebooks and Logs, when and how such deletion, overwriting, loss or destruction occurred, who did it, and why, including whether these items were deleted, overwritten, lost or destroyed pursuant to a document retention policy.

5. All measures You took to identify and notify any nonparties to preserve PRE, including the identity of such nonparties and the PRE such measures covered.

6. The name, location, and function of all computer systems that contain any information regarding the Named Plaintiffs or other class members, including but not limited to Hive and Data Warehouse, whether stored on an individual user level or in other form.

7. All retention policies concerning PRE, including all document-destruction program(s), such as ongoing erasures of e-mails, voicemails, and other electronically recorded material.

8. The organizational structure, hierarchy, function, and responsibilities of the Litigation Hold Departments.

9. The names, titles, and responsibilities of the employees in the Litigation Hold Departments.

10. The identity and chain of command of Your entities, business sectors, departments, teams, and employees primarily involved with Third Parties' access to or use of Facebook Users' Content and Information not generally available through Platform, including:

- a. Those who granted Third Parties such access;
- b. Those who communicated with Third Parties regarding such use or access;
- c. Those who set Your policies regarding such use or access;
- d. Those who enforced Your policies regarding such use or access.

11. Regarding the "Org Tool" Facebook described in its March 26, 2020 letter:

- a. The name, location, and organization of any database associated with the Org Tool;
- b. The kinds of information contained in or accessible to the Org Tool regarding Facebook's employees and organization;
- c. The kinds or output or product that the Org Tool can generate;
- d. The use, management, location, collection, production, storage, backup, destruction, retention, and recovery of any document created using the Org Tool.
- e. When the current Org Tool was first implemented and what tools Facebook used before that for any of the same purposes.